REMARKS

Specification

Applicant has amended paragraph 0028 in the Specification to correct typographical errors. No new matter has been added.

Claims 1-14 are Allowable

The Office has rejected claims 1-14, at paragraphs 1-2 of the Office Action, under 35 U.S.C. §102(b), as being anticipated by U.S. Patent No. 6,463,300 ("Oshima"). Applicant respectfully traverses the rejections.

None of the cited references, including Oshima, disclose or suggest the specific combination of claim 1. For example, Oshima does not disclose a security function that associates the private content stored in the terminal memory with the first IMSI or first MSISDN/IMSI combination of the at least one authorized smart card to grant access to the private content only to the at least one authorized smart card, as recited in claim 1. In contrast to claim 1, Oshima discloses that data from an inserted SIM card is compared with data from a previously inserted SIM card, and that access to a mobile communication service network is allowed when there is a match, or when the user can supply a correct secret number via a key input section. *See* Oshima, col. 6, lines 35-55. Oshima does not disclose granting access to private content stored in the terminal memory. Hence, claim 1 is allowable.

Claims 2-8 depend from claim 1, which Applicant has shown to be allowable. Hence, Oshima fails to disclose at least one element of each of claims 2-8. Accordingly, claims 2-8 are also allowable, at least by virtue of their dependence from claim 1.

Further, the dependent claims recite additional features that are not disclosed by the cited references. For example, none of the references, including Oshima, disclose that a security function denies access to the private content to a smart card that is not an authorized smart card and grants access to the private content to an authorized smart card, as recited in claim 5. Instead, Oshima discloses that <u>access to a mobile communication service network</u> is allowed

when there is a match between data from an inserted SIM card and a previously inserted SIM card, or when the user can supply a correct secret number via a key input section. *See* Oshima, col. 6, lines 35-55. Oshima does not disclose granting access to private content stored in the terminal memory. For this additional reason, claim 5 is allowable.

Further, none of the references, including Oshima, disclose private content that includes discrete items and a private content IMSI/MSISDN that is associated with each item, as recited in claim 6, or private content that includes at least one group of contact information and a private content IMSI/MSISDN that is associated with each group, as recited in claim 7. In contrast to claims 6 and 7, Oshima discloses that data from a previously inserted SIM card is stored in a memory section of a mobile station, which is compared with data of a currently inserted SIM card to determine if there is a match. *See* Oshima, col. 6, lines 35-41. If there is no match, then a secret number stored in the memory section is compared with a key input by a user. *See* Oshima, col. 6, lines 43-48. Oshima does not disclose private content stored in the mobile station memory. For this additional reason, claims 6 and 7 are allowable.

None of the cited references, including Oshima, disclose or suggest the specific combination of claim 9. For example, Oshima does not disclose comparing private content IMSI/MSISDN information with IMSI/MSISDN information of a SIM from a plurality of SIMs to produce a comparison result, as recited in claim 9. In contrast to claim 9, Oshima discloses comparing data from an inserted SIM card with data from a memory section of a mobile station to determine if the current SIM card is the same as the previously inserted SIM card. *See* Oshima, col. 6, lines 35-42. Oshima does not disclose private content stored in the mobile station memory. Further, Oshima does not disclose denying access to the private content when the comparison result is negative or granting access to the private content when the comparison result is positive, as recited in claim 9. Therefore, Oshima does not disclose or suggest each element of claim 9. Hence, claim 9 is allowable.

Claims 10-14 depend from claim 9, which Applicant has shown to be allowable. Hence, Oshima fails to disclose at least one element of each of claims 10-14. Accordingly, claims 10-14 are also allowable, at least by virtue of their dependence from claim 9.

Further, the dependent claims recite additional features that are not disclosed by the cited references. For example, none of the references, including Oshima, disclose that the private content includes discrete items and that a private content IMSI/MSISDN is provided to each discrete item, as recited in claim 10. In contrast to claim 10, Oshima discloses that a memory section of a mobile station has a SIM data storing section that stores <u>a part of data stored in the SIM for comparison with a subsequent SIM</u>. *See* Oshima, col. 6, lines 28-41. Oshima does not disclose stored private content accessible via a private content IMSI/MSISDN. For at least this reason, claim 10 is allowable.

Further, none of the references, including Oshima, disclose that the private content includes at least one group of contact information and that a private content IMSI/MSISDN is provided to each group, as recited in claim 11. In contrast to claim 11, Oshima discloses a secret number storing section to store a secret number <u>for comparison with a user entered secret number</u> in the event that the subsequent SIM does not match the previously stored SIM data. *See* Oshima, col. 6, lines 42-47. Oshima does not disclose stored private content accessible via a private content IMSI/MSISDN. For at least this reason, claim 11 is allowable.

The Office has rejected claims 1-14, at paragraphs 3-4 of the Office Action, under 35 U.S.C. §102(e), as being anticipated by U.S. Patent No. 6,970,817 ("Ross"). Applicant respectfully traverses the rejections.

None of the cited references, including Ross, disclose or suggest the specific combination of claim 1. For example, Ross does not disclose at least one smart card having first IMSI information, or a first MSISDN/IMSI combination, that identifies the at least one smart card as an <u>authorized smart card</u>, as recited in claim 1. Instead, Ross associates each VR tag residing in a device with a corresponding data record in the removable media through the use of a set of digital keys, so that when the VR tag is invoked, the data record residing in the removable media can be accessed. *See* Ross, col. 3, lines 58-63. Ross <u>does not disclose that the removable media has an identifier (IMSI or MSISDN/IMSI) that identifies it as an authorized smart card</u>.

Further, none of the cited references, including Ross, disclose or suggest a security function that associates the private content stored in the terminal memory with the first IMSI or first MSISDN/IMSI combination of the at least one authorized smart card to grant access to the private content only to the at least one authorized smart card, as recited in claim 1. Instead, Ross discloses creating a set of digital keys that are based on corresponding data records residing in removable media, and associating each digital key with a corresponding Voice Recognition (VR) tag stored in a device such as a cellular telephone, so that when the VR tag is invoked the corresponding data record in the removable media can be accessed. See Ross, col. 2, lines 24-30, and lines 58-63. Ross does not disclose granting access to private content by an authorized smart card.

Therefore, Ross does not disclose or suggest each of the elements of claim 1. Hence, claim 1 is allowable.

Further, the dependent claims recite additional features that are not disclosed by the cited references. For example, none of the cited references, including Ross, disclose a terminal that includes a private content IMSI/MSISDN associated with the private content, as recited in claim 5. Ross also fails to disclose or suggest a security function that denies access to the private content to a smart card that is not an authorized smart card and grants access to the private content to an authorized smart card, as recited in claim 5. Instead, Ross discloses that a unique digital key is generated for each data record stored on a removable medium, and that each digital key is associated with a corresponding VR tag stored in a device. See Ross, col. 2, lines 24-30, and col. 3, lines 17-21. Ross further discloses comparing digital keys stored in the removable medium with keys in the device to establish a match between each VR tag and a corresponding data record, so that when the VR tag is invoked the data record stored on the removable media is accessed. See Ross, col. 2, lines 24-34, and col. 3, lines 60-63. Thus, in contrast to claim 5, Ross discloses a generating a unique digital key for each of the data records stored on the removable media and associating the key with a corresponding VR tag stored on the device. For this additional reason, claim 5 is allowable.

Further, none of the cited references, including Ross, disclose private content that includes discrete items and a private content IMSI/MSISDN associated with each item as recited in claim 6, or private content that includes at least one group of contact information and a private content IMSI/MSISDN associated with each group, as recited in claim 7. Instead, Ross discloses that a unique digital key is generated for each data record stored on a removable medium, and that each digital key is associated with a corresponding VR tag stored in a device. *See* Ross, col. 2, lines 24-30, and col. 3, lines 17-21. Ross further discloses comparing digital keys stored in the removable medium with keys in the device to establish a match between each VR tag and a corresponding data record, so that when the VR tag is invoked the data record stored on the removable media is accessed. *See* Ross, col. 2, lines 24-34, and col. 3, lines 60-63. For this additional reason, claims 6 and 7 are allowable.

None of the cited references, including Ross, disclose or suggest the specific combination of claim 9. For example, Ross does not disclose comparing private content IMSI/MSISDN information with IMSI/MSISDN information of a SIM from a plurality of SIMs to produce a comparison result, as recited in claim 9. Instead, Ross discloses that a unique digital key is generated for each data record stored on a removable medium, and that each digital key is associated with a corresponding VR tag stored in a device. *See* Ross, col. 2, lines 24-30, and col. 3, lines 17-21. Ross further discloses comparing digital keys stored in the removable medium with keys in the device to establish a match between each VR tag and a corresponding data record, so that when the VR tag is invoked the data record stored on the removable media is accessed. *See* Ross, col. 2, lines 24-34, and col. 3, lines 60-63.

Further, Ross does not disclose denying access to the private content when a comparison result is negative or granting access to the private content when a comparison result is positive, as recited in claim 9. In contrast to claim 9, Ross compares digital keys of VR tags stored on a device (e.g., cellular telephone) with digital keys of data records residing on removable media and associates a particular data record with a corresponding VR tag via the corresponding digital key, so that when the VR tag is invoked the data record residing on the removable media is accessed. *See* Ross, col. 2, lines 30-34, and col. 3, lines 58-63. Ross does not disclose denying or granting access to private content stored on a device.

Therefore, Ross does not disclose or suggest each element of claim 9. Hence, claim 9 is allowable.

Claims 10-14 depend from claim 9, which Applicant has shown to be allowable. Hence, Ross fails to disclose at least one element of each of claims 10-14. Accordingly, claims 10-14 are also allowable, at least by virtue of their dependence from claim 9.

Further, the dependent claims recite additional features that are not disclosed by the cited references. For example, none of the references, including Ross, disclose that the private content includes discrete items and that a private content IMSI/MSISDN is provided to each discrete item, as recited in claim 10, or that the private content includes at least one group of contact information and that a private content IMSI/MSISDN is provided to each group, as recited in claim 11. Instead, Ross discloses that a unique digital key is generated for each data record stored on a removable media, and that each digital key is associated with a corresponding VR tag stored in a device. *See* Ross, col. 2, lines 24-30, and col. 3, lines 17-21. Ross further discloses comparing digital keys stored in the removable medium with keys in the device to establish a match between each VR tag stored in the device and a corresponding data record stored in the removable media, so that when the VR tag is invoked the data record residing on the removable media is accessed. *See* Ross, col. 2, lines 24-34, and col. 3, lines 60-63. Thus, in contrast to claims 10 and 11, Ross discloses a generating a unique digital key for each of the data records stored on the removable media and associating the key with a corresponding VR tag stored on the device. Ross does not disclose denying or granting access to private content stored on a device. For this additional reason, claims 10 and 11 are allowable.

Claims 15-20 are Allowable

The Office has rejected claims 15-20, at paragraphs 5-6 of the Office Action, under 35 U.S.C. §103(e), as being unpatentable over Oshima in view of U.S. Pat. Pub. No. 2005/0176409 ("Carpenter"). Applicant respectfully traverses the rejections.

None of the cited references, including Oshima and Carpenter, disclose the specific combination of claim 15. For example, Oshima does not disclose or suggest that access to all or to a pre-defined portion of private content stored on internal memory of the mobile equipment occurs only when IMSI/MSISDN information of a SIM correlates to IMSI/MSISDN information of the private content, or of the pre-defined portion of the private content, stored in the memory of the mobile equipment, as recited in claim 15. In contrast to claim 15, Oshima discloses that data from an inserted SIM card is compared with data from a previously inserted SIM card, and that <u>access to a mobile communication service network</u> is allowed when there is a match, or when the user can supply a correct secret number via a key input section. *See* Oshima, col. 6, lines 35-55. Oshima does not disclose granting access to private content stored in the memory of a mobile device. Further, Carpenter does not disclose this element of claim 15. Instead, Carpenter discloses that a <u>SIM is typically protected</u> by a four digit Personal Identification Number stored therein and known only by the end user. *See* Carpenter, paragraph 0024. Carpenter does not disclose granting access to private content stored in the memory of a mobile device.

Therefore, Oshima and Carpenter, separately or in combination, do not disclose or suggest each element of claim 15. Hence, claim 15 is allowable.

Claims 16-20 depend from claim 15, which Applicant has shown to be allowable. Therefore, Oshima and Carpenter fail to disclose at least one element of each of claims 16-20. Hence, claims 16-20 are allowable, at least by virtue of their dependence from claim 15.

Further, the dependent claims recite additional elements that are not disclosed by the cited references. For example, Oshima and Carpenter, separately or in combination, do not disclose or suggest private content that includes one or more of the following items: (a) one or more ring tones, (b) one or more games, (c) one or more images, (d) one or more video files, or (d) one or more audio files, as recited in claim 17, or that the private content includes one or more of the following groups of contact information: (a) push-to-talk, (b) instant text messaging, (c) instant voice messaging, (d) buddy list, (e) email addresses, or (f) phone numbers, as recited in claim 19. Instead, Oshima discloses that data from an inserted SIM card is compared with

data from a previously inserted SIM card, and that <u>access to a mobile communication service network is allowed when there is a match</u>, or <u>when the user can supply a correct secret number</u> via a key input section. *See* Oshima, col. 6, lines 35-55. Oshima does not disclose granting access to private content stored in the memory of a mobile device. Further, Carpenter does not disclose these elements of claims 17 and 19. Instead, Carpenter discloses that a <u>SIM is typically protected</u> by a four digit Personal Identification Number stored therein and known only by the end user. *See* Carpenter, paragraph 0024. Therefore, Oshima and Carpenter, separately or in combination, do not disclose each and every element of claims 17 and 19.

Additionally, the Office has cited Ross in the rejection of claim 17. *See* Office Action, page 9, second paragraph. Ross does not disclose the elements of claim 17 that are not disclosed by Oshima and Carpenter. Instead, Ross discloses digital keys that generated from data records stored in a removable medium, which keys are compared with digital keys associated with voice recognition (VR) tags stored in a device, in order to establish a match between each VR tag and the corresponding data record, so that when the VR tag is invoked the data record is accessed. *See* Ross, col. 2, lines 24-34, and col. 3, lines 60-63. The digital keys and VR tags of Ross that are stored in the device memory are not private content. Ross does not disclose private content stored on a device. Therefore, Oshima, Carpenter, and Ross, separately or in combination, do not disclose each and every element of claim 17.

For the additional reasons presented above, claim 17 is allowable.

CONCLUSION

Applicant has pointed out specific features of the claims not disclosed, suggested, or rendered obvious by the references applied in the Office Action. Accordingly, Applicant respectfully requests reconsideration and withdrawal of each of the objections and rejections, as well as an indication of the allowability of each of the pending claims.

Any changes to the claims in this amendment, which have not been specifically noted to overcome a rejection based upon the prior art, should be considered to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attach thereto.

The Examiner is invited to contact the undersigned attorney at the telephone number listed below if such a call would in any way facilitate allowance of this application.

The Commissioner is hereby authorized to charge any fees, which may be required, or credit any overpayment, to Deposit Account Number 50-2469.

Respectfully submitted,

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Page 15 of 15   U.S. App. No.: 10/764.668